



KAISER • HILL
COMPANY

INTEROFFICE MEMORANDUM

DATE: April 19, 2001
TO: Distribution
FROM: K. North, K-H/ESS, T130C, X9876 *km*
SUBJECT: PERIMETER SECURITY ZONE CLOSURE PROJECT - KN-055-01

As described in the attached Environmental Checklist, the Site plans to remove fences, alarm systems, and razor wire within the Perimeter Security Zone, demolish and remove Buildings 762, 762A, 792, 792A, 550, 761, and 901, remove debris, and restore the area.

Please review the Environmental Checklist with respect to your areas of expertise and responsibility for any issues related to project effects or compliance. If you need additional information about the project, contact Niles Jokela (X8132).

By close of business on April 25, 2001, please submit:

1. your comments or concerns, or
2. a statement that the project presents no issues for your area of responsibility (e-mail is acceptable).

Attachments:
As Stated

Distribution:

Laura Brooks, K-H
Leslie Dunstan, RMRS
Mike Putney, Radian
Tamar Krantz, LABAT
Keith Motyl, RFCSS

Marcia Murdock, K-H
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Andy Rosenman, K-H
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- SAFE AND COMPLIANT CLOSURE -

ADMIN RECORD

IA-A-000810

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KAISER-HILL ENVIRONMENTAL SYSTEMS AND STEWARDSHIP ENVIRONMENTAL CHECKLIST ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

The purpose of the environmental checklist (EC) is to provide information for review of work activities (e.g., IWCP work packages) by the Project environmental staff and Environmental Systems and Stewardship (ESS) personnel. These reviews ensure that environmental compliance is part of the IWCP planning and work process. An EC should be submitted to ESS for any activity in which compliance with environmental laws or regulations or environmental protection could be affected. Completed ECs are typically processed in less than five work days. Review the instructions for details on each topic.

- **PROJECT OR ACTIVITY NAME:** PSZ Closure Project
- **PROPOSED START DATE:** May 29, 2001
- Please specify and explain any schedule urgency or deadlines:
- **RESPONSIBLE MANAGER (NAME, BLDG., EXT.):** J.R. Marschall, B116, x2372
- **POINT OF CONTACT (NAME, BLDG., EXT.):** J.R. Marschall, B116, x2372
- **DETAILED WORK DESCRIPTION:** The PSZ Closure Project consists of the removal of fences, alarm systems, and razor wire within the Perimeter Security Zone, demolition and removal of Buildings 762, 762A, 792, and 792A, and demolition and removal of Buildings 550, 761, and 901 as well as disposition of all demolition debris, and backfilling, vegetating, and grading each site. Support operations include location and removal or capping (to 3 feet below grade) of all utilities within the within the footprints of the above facilities.

Conditions of Approval:

Approval: _____
K. North, Environmental Systems and Stewardship

Date: _____

ENVIRONMENTAL CHECKLIST

YES

NO

1. COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA):

- Is the work required or covered by the Rocky Flats Cleanup Agreement (RFCA)? ☒ YES ☐ NO
- Will the work include decontamination and decommissioning activities? ☒ YES ☐ NO
- Will the work include environmental restoration? ☒ YES ☐ NO

2. SOILS OR ASPHALT DISTURBANCE:

- Will soils or asphalt be disturbed? ☒ YES ☐ NO
- Is the soil or asphalt expected to be contaminated? ☐ YES ☒ NO

If YES, estimated volume of material to be disturbed and type of contaminants:

- Will the disturbance occur in or near an IHSS? (Please list IHSS numbers in 'Additional Comments' section). ☒ YES ☐ NO
- Are soils or asphalt to be characterized as part of the project (see instructions)? ☒ YES ☐ NO
- Will the soils or asphalt be recycled? ☐ YES ☒ NO
- Will soils or asphalt be managed as waste? ☒ YES ☐ NO

If YES, where would the waste be stored on-site and what off-site facility would be used? **Roll-Offs will be used on-site, and only RFETS approved facilities will be used for off-site disposal.**

- Will excavated soils or asphalt be put back into the excavation? ☒ YES ☐ NO
- Will excavated soils and asphalt be stockpiled? ☐ YES ☒ NO

If YES, where and for how long (estimation)?

3. WASTE MANAGEMENT:

What types of waste will be generated? (Estimated Quantity)

- | | | |
|----------------------------------|--|--|
| <input type="checkbox"/> TRU () | <input type="checkbox"/> LLMW () | <input checked="" type="checkbox"/> Hazardous (minimal) |
| <input type="checkbox"/> TRM () | <input checked="" type="checkbox"/> Sanitary (TBD) | <input checked="" type="checkbox"/> PCBs (PCB Bulk Product Waste) |
| <input type="checkbox"/> LLW () | <input checked="" type="checkbox"/> Liquid (TBD, Incidental) | <input checked="" type="checkbox"/> Asbestos (B762 & B792 Roof Flashing) |

- Has a waste management plan been prepared? ☐ YES ☒ NO
- Potential on-site or off-site facility to manage waste: **Only RFETS approved facilities will be used.**
- Estimated quantity shipped off-site, by waste type: **TBD**

ENVIRONMENTAL CHECKLIST

YES

NO

4. CLEAN AIR ACT (CAA):

- Will work involve processing of materials or disturbing surface areas that would increase air pollutants (e.g., dust, radionuclides, VOCs?) ☒ ☐
If YES, provide contaminant levels, process rates and emission rates. **Stationary fuel sources may be used. Dust from building demolition will be generated. The PSZ Closure Statement of Work requires that all stationary fuel-fired equipment used must meet Colorado Air Quality Control Commission (CAQCC) Regulation No.1. The Statement of Work also requires submittal of a list of all equipment (including machinery and powered tools) and submittal of a Dust Control Plan prior to initiating work.**
- Will the work involve use of fuel-fired (e.g., generators, compressors and pumps) equipment? ☒ ☐
If YES, is it rental equipment or existing Site equipment? **Subcontractor Provided**
- Will work include installation, removal, or maintenance of equipment containing ozone depleting compounds? ☐ ☒
- Will the work occur in an enclosed permanent structure? ☐ ☒
- Will the work involve radionuclides or occur in an area with potential radionuclide contamination? ☐ ☒
If YES, provide details (see instructions)
- Will the work involve asbestos removal? ☒ ☐
If YES, provide an estimated volume. **B762 & B792 Roof Flashing**
- Have baseline-monitoring requirements been discussed with ESS? ☐ ☒

5. CLEAN WATER ACT (CWA):

- Does the work impact:
 - Surface water or areas with potential runoff to surface water drainages? ☐ ☒
 - Ground water or subsurface penetrations or disturbances? ☐ ☒
 - Water treatment? ☐ ☒
 - Sewage treatment plant? ☐ ☒
 - Special water sources (e.g., Great Western Reservoir)? ☐ ☒
- Could this work release pollutants (e.g., liquids, sediment) to surface water? ☒ ☐
If YES, please explain, including identification of pollutants, where release could go, or discuss in Work Description. **There is potential for vehicle/equipment spills such as hydraulic oil, antifreeze, or fuel and product spills, however, the possibility that any such spills might reach surface water is slight.**
- Could this work release pollutants to the sanitary waste system via drains? ☐ ☒
- Does this work involve D&D of a building or an ER activity? ☒ ☐
If YES, have baseline-monitoring requirements been discussed with ESS? ☐ ☒
- Will incidental water need to be treated on-Site? ☐ ☒

ENVIRONMENTAL CHECKLIST

6. TANKS:

- Will tanks, process lines, waste lines, sumps, or drains be affected by the work? ☒ ☐
If YES, please explain below, including where an accidental release could go, or discuss in Work Description. **Water and sewer lines will be capped at 3 feet below grade. The potential of an accidental release to these lines is slight.**
- Will tanks be drained, removed, or otherwise affected? ☐ ☒
- Are the tanks above ground storage tanks? ☐ ☒
- Are the tanks underground storage tanks? ☐ ☒
- Will RCRA-regulated tanks be drained, removed, or otherwise affected as a result of the action? ☐ ☒

7. POLLUTION PREVENTION (Visit the P2 website for additional information):

- Has pollution prevention (e.g., waste minimization, energy efficiency, recycling or reuse, water conservation, and "green" procurement) been integrated into work planning and execution? ☒ ☐
If YES, describe below or in Work Description. Include estimates of quantifiable waste reductions and cost savings. **To be determined**

8. ECOLOGY (Note that Site ecologists will provide final determinations):

- Will the work potentially affect:
 - Threatened or endangered species habitat (e.g., Preble's Mouse)? ☐ ☒
 - Wetlands (e.g., dredge or fill operations)? ☐ ☒
 - Designated natural areas? ☐ ☐
 - Birds or bird nests? ☒ ☐
- Will disturbed areas require revegetation? ☒ ☐

9. OTHER ISSUES:

- Have the ARARs been identified and documented? ☒ ☐
- Is this work part of a RCRA Corrective Action? ☐ ☒
- Is the work described in a closure description document or other decision document? ☒ ☐
- Will any new or project-specific chemicals be used (not currently used on-Site)? ☒ ☐
- Could the work affect drinking water sources or supplies? ☒ ☐
- If the work is a clean-up action, will cost and duration stay within \$5 million and 60 months? ☒ ☐
- Will the work potentially result in long-term changes to the environment? ☐ ☒
- Is the work likely to be publicly controversial? ☐ ☒
- Will the action establish a precedent for future projects that will have significant effects, or represent a "decision in principle" about a future consideration? ☐ ☒

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ENVIRONMENTAL CHECKLIST

- Is the action related to other projects or to a larger program?



If YES, please explain below or discuss in Work Description. **RFCA**

ADDITIONAL COMMENTS:

Section 2: Project occurs in or is near the following IHSS: 197, 117.1, 186, 153, 154, & 123.1. Excavated soils will only be put back into the soil during Sewer and Water line capping, any excavated soil or asphalt generated during the PSZ Closure Project will be dispositioned as waste.

Section 3: The PSZ Closure Project SOW requires submittal of a Waste Management Plan.

Section 9: The effect on Drinking water sources or supplies is the capping of drinking water lines.

NEPA Concerns: Planning for the Protected Area Reconfiguration Project and the PSZ Closure Project began as early as 1995. In December of 1995 an Environmental Assessment and Finding of No Significant Impact (DOE/EA-1132) was completed. This document discusses alternatives, addresses NEPA concerns for the project, and ultimately reaches a conclusion of No Significant Impact. Assuming the PSZ Closure Project Buildings are categorized as Type 1 facilities, as is expected, EA-1132 and RFETS established Categorical Exclusions should address all NEPA concerns. Should the PSZ Closure Project Buildings be categorized as Type 2 facilities, additional NEPA concerns are addressed in the RFCA Standard Operating Protocol for Facility Disposition (Facility Disposition RSOP) and the RFCA Standard Operating Protocol for Facility Component Removal, Size Reduction, and Decontamination Activities. These RSOPs are the guidance decision documents for the PSZ Closure Project. Section 5 of the Facility Disposition RSOP contains an extensive discussion of NEPA concerns, and Section 6 of the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP also addresses NEPA concerns.